

OPENNESS POLICY AND PLAN



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Office of Safety Regulation

U.S. Department of Energy
Richland Operations Office
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Date: 9/3/02

PREFACE

As directed by Congress in Section 3139 of the *Strom Thurmond National Defense Authorization Act for Fiscal Year 1999*, the U.S. Department of Energy (DOE) established the Office of River Protection (ORP) at the Hanford Site to manage the River Protection Project (RPP), formerly known as the Tank Waste Remediation System. ORP is responsible for the safe storage, retrieval, treatment, and disposal of the high level nuclear waste stored in the 177 underground tanks at Hanford.

The initial concept for treatment and disposal of the high level wastes at Hanford was to use private industry to design, construct, and operate a Waste Treatment Plant (WTP) to process the waste. The concept was for DOE to enter into a fixed-price contract for the Contractor to build and operate a facility to treat the waste according to DOE specifications. In 1996, DOE selected two contractors to begin design of a WTP to accomplish this mission. In 1998, one of the contractors was eliminated, and design of the WTP was continued. However, in May 2000, DOE chose to terminate the privatization contract and seek new bidders under a different contract strategy. In December 2000, a team led by Bechtel National, Inc. was selected to continue design of the WTP and to subsequently build and commission the WTP.

On January 10, 2001, the U.S. Department of Energy published the revised Nuclear Safety Management rule, 10 CFR 830. This rule, in Subpart B, "Safety Basis Requirements," established specific requirements for the establishment and maintenance of the safety basis of DOE nuclear facilities, including the River Protection Project Waste Treatment Plant (RPP-WTP) project.

A key element of the River Protection Project Waste Treatment Plant (RPP-WTP) is DOE regulation of safety. The regulation is authorized by the document entitled *Policy for Radiological, Nuclear, and Process Safety Regulation of the River Protection Project Waste Treatment Plant Contractor* (DOE/RL-96-25) (referred to as the Policy) and implemented through the document entitled *Memorandum of Agreement for the Execution of Radiological, Nuclear, Process Safety Regulation of the RPP-WTP Contractor* (DOE/RL-96-26) (referred to as the MOA). These two documents provide the basis for the safety regulation of the RPP-WTP at Hanford, including the implementation of regulatory requirements such as 10 CFR 830.

The foundation of both the Policy and the MOA is that the mission of removal and immobilization of the existing large quantities of tank waste by the RPP-WTP Contractor must be accomplished safely, effectively, and efficiently.

The Policy maintains the essential elements of the regulatory program established by DOE in 1996 for the privatization contracts. The MOA clarifies the DOE organizational relationships and responsibilities for safety regulation of the RPP-WTP. The MOA provides a basis for key DOE officials to commit to teamwork in implementing the policy and achieve adequate safety of RPP-WTP activities.

The Policy, the MOA, the RPP-WTP Contract, and the four documents incorporated in the Contract define the essential elements of the regulatory program being executed by the ORP. The four documents incorporated into the Contract (and also in the MOA) are

as follows:

Concept of the DOE Process for Radiological, Nuclear, and Process Safety Regulation of the RPP Waste Treatment Plant Contractor, DOE-96-0005,

DOE Process for Radiological, Nuclear, and Process Safety Regulation of the RPP Waste Treatment Plant Contractor, DOE/RL-96-0003,

Top-Level Radiological, Nuclear, and Process Safety Standards and Principles for the RPP Waste Treatment Plant Contractor, DOE/RL-96-0006, and

Process for Establishing a Set of Radiological, Nuclear, and Process Safety Standards and Requirements for the RPP Waste Treatment Plant Contractor, DOE/RL-96-0004.

DOE patterned its safety regulation of the RPP-WTP Contractor to be consistent with the concepts and principles of good regulation (reliability, clarity, openness, efficiency, and independence) used by the Nuclear Regulatory Commission (NRC). In addition, the DOE principles of integrated safety management were built into the regulatory program for design, construction, operation, and deactivation of the facility. The regulatory program for nuclear safety permits waste treatment services to occur on a timely, predictable, and stable basis, with attention to safety consistent with that which would occur from safety regulation by an external agency. DOE established a dedicated regulatory organization to be a single point of DOE contact for nuclear safety oversight and approvals for the WTP Contractor. This organization performs nuclear safety review, approval, inspection, and verification activities for ORP using the NRC principles of good regulation while defining how the Contractor shall implement the principles of standards-based integrated safety management.

A key feature of this regulatory process is its definition of how the standards-based integrated safety management principles are implemented to develop a necessary and sufficient set of standards and requirements for the design, construction, operation, and deactivation of the RPP-WTP facility. This process meets the expectations of the DOE necessary and sufficient closure process (subsequently renamed Work Smart Standards process) in DOE Policy 450.3, *Authorizing Use of the Necessary and Sufficient Process for Standards-based Environment, Safety and Health Management*, and is intended to be a DOE approved process under DOE Acquisition Regulations, DEAR 970.5204-2, *Laws, Regulations and DOE Directives*, Section (c). DOE approval of the contractor-derived standards is assigned to the Manager, Office of River Protection.

The RPP-WTP Contractor has direct responsibility for WTP safety. DOE requires the Contractor to integrate safety into work planning and execution. This integrated safety management process emphasizes that the Contractor's direct responsibility for ensuring that safety is an integral part of mission accomplishment. DOE, through its safety regulation and management program, verifies that the Contractor achieves adequate safety by complying with approved safety requirements.

This document is available to the public through the DOE Public Reading Room located at the Consolidated Information Center, Washington State University, Room 101L, Richland, Washington.
Copies may be purchased for a duplication fee

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OPENNESS POLICY

Regulation of the safety of the River Protection Project Waste Treatment Plant (RPP-WTP) at the Hanford Site shall be transacted publicly and candidly. Information that the Office of Safety Regulation uses to make its decisions shall be publicly available, with due consideration of limited rights data and other protected information.

The involvement of the employees, Tribal Nations, stakeholders, and the public in decisions concerning safety regulation is welcomed and encouraged. The involvement improves the processes and products and helps to ensure safety.

All members of the public are provided the same access to information and opportunity for involvement in the process. In addition, the Office of Safety Regulation recognizes its special obligations to inform and involve the Tribal Nations.

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OPENNESS PLAN

1.0 BACKGROUND

This Openness Plan is addressed to all interested parties: employees, Tribal Nations, stakeholders, the public, the River Protection Project (RPP) Contractor, and the U.S. Department of Energy (DOE), including the Office of Safety Regulation (OSR). Not all sections of the Openness Plan may be applicable or of interest to all groups; however, this Plan describes the full extent of the OSR openness activities. The OSR Openness Policy and Plan are fully consistent with the Office of River Protection (ORP) Communications Plan and Openness Policy and Plan.

Essential documents defining the regulatory program are available on the OSR website at <http://www.hanford.gov/osr/osr.asp>. The OSR also provides documents to the U.S. DOE Public Reading Room at Washington State University Tri-Cities. All documents cited in this document are available on the OSR website.

DOE established the OSR to regulate the design, construction, and operation of the planned RPP Waste Treatment Plant (WTP) facilities. The mission of the OSR is to establish acceptable performance and safety standards that will ensure adequate safety¹ and then, through oversight, ensure that these standards are met throughout design, construction, commissioning, operation, and deactivation.

The Contractor has primary responsibility for safety. DOE requires the Contractor to integrate safety into all facets of work planning and execution. This Integrated Safety Management process emphasizes that the Contractor has direct responsibility for ensuring that safety² is an integral part of the work. DOE, through its regulatory program, is responsible for verifying that the Contractor designs, constructs, and operates a safe facility by complying with approved safety requirements.

DOE regulates the Contractor's actions for safety under the provisions of the Atomic Energy Act as well as applicable public laws and regulations. Therefore, safety regulation is accomplished under both the requirements of DOE nuclear safety rules³ and by Contract between the Contractor and DOE.⁴ The law and the Contract define the boundaries for OSR regulation to which this Openness Plan applies.

The regulatory process requires that the Contractor propose and justify specific standards that will be met, rather than being required to use existing DOE general-purpose standards. With this

¹ Adequate safety does not mean "at the limit" or "just barely enough." Rather it is defined by solid requirements and a rigorous process the Contractor must follow.

² Within Integrated Safety Management, the term "safety" is used synonymously with the term "environment, safety, and health" to encompass protection of the public, the workers, and the environment. The OSR is responsible for radiological, nuclear, and process safety regulation. The Environmental Protection Agency and Washington State, through the Departments of Ecology and Health, are the primary environmental regulators.

³ 10 CFR 820, "Procedural Rules for DOE Nuclear Activities;" 10 CFR 830 "Nuclear Safety Management," 10 CFR 835, "Occupational Radiation Protection," 10 CFR 707, "Contractor Employee Protection," and Compliance Orders issued pursuant to 10 CFR 820, Subpart C.

⁴ Contract DE-AC27-01RV14136 between DOE and Bechtel National, Inc., dated December 11, 2000.

added Contractor responsibility for safety comes increased accountability, not only to DOE but also to employees, Tribal Nations, stakeholders, and the public. Input from the interested parties can significantly assist in the process. Therefore, the OSR and the Contractor want to make regulatory activities open and visible so that input can be obtained from interested parties.

Openness is an essential principle of the agreements that created the OSR and is cited as an implementing principle in DOE/RL-96-25, *Policy for Radiological, Nuclear, and Process Safety Regulation of RPP-WTP Contractor*. DOE/RL-96-26, *Memorandum of Agreement for the Execution of Radiological, Nuclear, and Process Safety Regulation of the RPP-WTP Contractor* contains specific direction on implementing openness. The OSR believes it is obligated by this principle to ensure that the entire regulatory process occurs in a way that is open to employees, Tribal Nations, stakeholders, and the public.

Openness also means that the information the OSR uses to make its decisions is concurrently available to the public unless the information contains "limited rights data,"⁵ or other sensitive information. Few Contractor regulatory submittals contain limited rights data.

The OSR performs expert reviews and recognizes that those reviews improve when more viewpoints are considered, so employee, Tribal Nation, stakeholder, and public comments are encouraged. The OSR also emphasizes openness because it promotes responsible behavior on the part of both the Contractor and the regulator.

The OSR organization as of August 2002 is shown below. The OSR Project Management Official, A. R. Hawkins (509-372-0805), is responsible for implementing this Openness Plan, involving others as needed and as noted in the Plan.

⁵ The current Contract defines "limited rights data" and provides for such information to be protected from public disclosure. Previously, such data were called "proprietary information." OSR Management Directive 2.1, *Information Management*, describes the process for determining the classification of information and for nondisclosure of protected information.

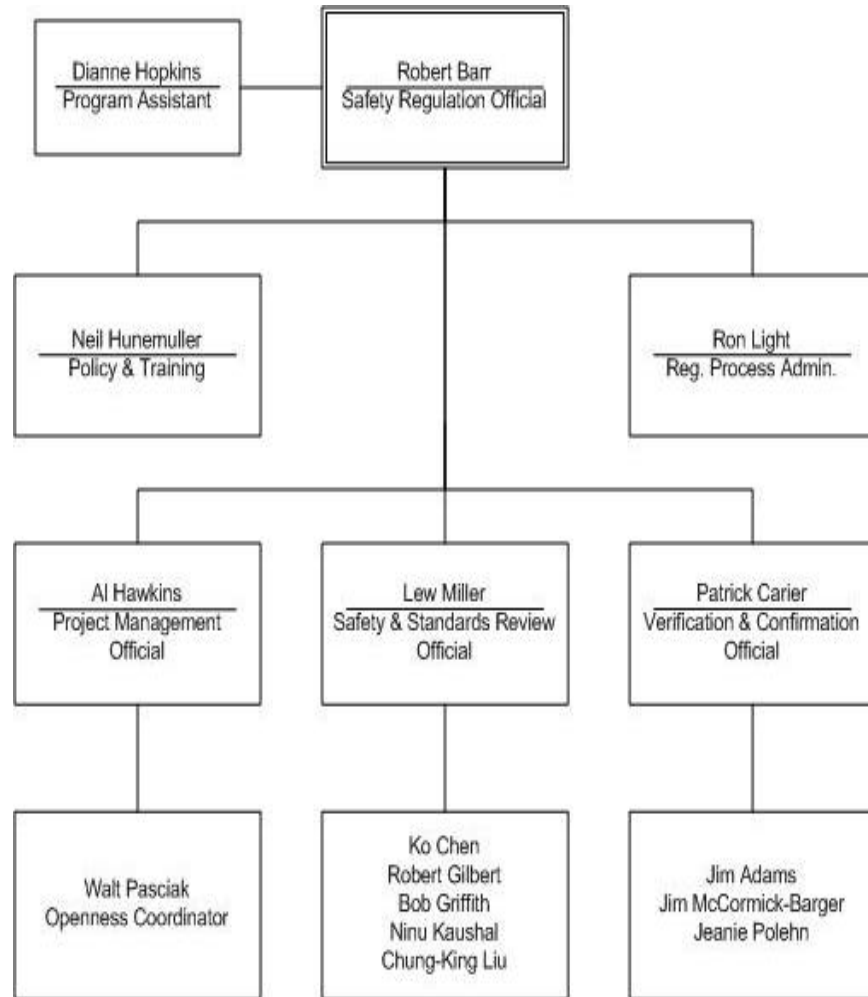


Figure 1. Office of Safety Regulation Organization

2.0 OPENNESS

The purpose of safety regulation is to establish acceptable performance standards and, through regulatory oversight, ensure that these safety standards are met throughout the life of the project. Input from interested parties can significantly assist in this effort. Openness is, therefore, an essential part of the OSR regulatory process.

The OSR believes that safety regulation is the public's business. Therefore, the model for its regulatory work has these basic components:

- All decision meetings with the Contractor are open to the public.
- Regulatory submittals and correspondence are released routinely.
- Public comments on Contractor submissions are welcomed.

- Meetings are documented, and this documentation is made public.
- Special care is needed for handling limited rights data.
- To prevent undue delays in the project, OSR openness recognizes the need for a continuous and flexible interaction between the OSR and interested parties.

The OSR responds to public comments. The public can comment at any time, but schedule milestones must be taken into consideration to ensure that interested parties are heard and that the process moves forward.

The staff members of the OSR were affected by the events of September 11, 2001, as were some of our work activities. The nature of safety analysis is to identify and prevent events that could harm workers, the public, or the environment. Typically, this requires defining plant systems, vulnerabilities, and protective measures in detail. Unfortunately, the same information used to prevent a safety problem could be used to cause a major incident.

Previously, the OSR provided much of this detailed information on the Internet, where it could be accessed worldwide. We did not control – or even monitor – access to our website. While we continue not to monitor website use, we are now reviewing and withholding some detailed information previously posted. As you will see from visiting our website, most information on OSR activities continues to be posted as before.

- It is not OSR's intent to withhold information from members of the Tribal Nations, stakeholder groups, the public, or any group who shares our interest in completing the Hanford cleanup. If you have any concern about the availability of the information used to support safety analysis activities or if you have specific information needs, please contact the Project Management Official directly (509-372-0805).

This Openness Plan shows how the OSR actively solicits comments from interested parties on the safety of the facilities proposed by the Contractor and on the regulatory process itself. Input into the regulatory process is sought as early as possible so that issues and concerns are identified and addressed before decisions are made.

When the Contractor requests an authorization, such as start of construction, it is the OSR's responsibility to ensure that the proposed authorization complies with the law and the Contract. Thus, OSR responses to these authorizations must be visible to interested parties. Interested parties may make their concerns known to the Contractor or to the OSR, and each has a responsibility to respond.

It is important that interested parties have confidence in the decisions of the OSR. This Plan shows how the OSR communicates consistently with interested parties and how its regulatory performance is clearly visible at all times.

The intent is to provide all interested parties with the same opportunities to be heard, to receive information on, and to be involved in the regulatory process. The OSR makes specific efforts to understand the interests and concerns of the Tribal Nations. Additionally, the OSR recognizes

certain stakeholders and interest groups who have a specific interest in the regulation of the RPP-WTP facility.

Interest groups include but are not limited to the following:

- Tribal Nations
- Hanford Advisory Board (HAB) members and committees
- Washington and Oregon State agencies
- News media
- Hanford employees
- Unions
- Local residents
- Federal agencies
- U.S. Congress
- State and local governments
- Regional environmental public interest groups.

3.0 APPROACH

The OSR Openness Plan includes the following activities:

- The OSR listens to interested parties by providing independent opportunities to comment and by meeting and conducting open dialogues. Comments from interested parties are distributed to appropriate members of the OSR staff for consideration and are made part of the regulatory record.
- The OSR speaks to interested parties. It makes information on regulatory activities available and ensures the information is current.
- The OSR obtains feedback, responds to comments, and ensures that those providing input understand how their comments affect the regulatory process.

The OSR engages interested parties factually. The OSR recognizes the importance of making objective decisions from among a range of possible solutions. Presentations and informational meetings provide the background, the options considered, and the basis for decisions so that relevant input can be obtained before decisions are made.

4.0 SCHEDULE

Openness is an ongoing process. A goal of the OSR is to ensure productive and effective two-way communication. The mechanisms for communicating with the OSR are in place.

The current top-level schedule for the major regulatory actions for RPP-WTP activities is shown below. Significant regulatory actions, Standards Approval, and an Initial Safety Evaluation have been completed. A full schedule of regulatory activities, including openness activities, is

maintained on the OSR website.⁶ Each major regulatory action provides an opportunity for interested parties to comment.

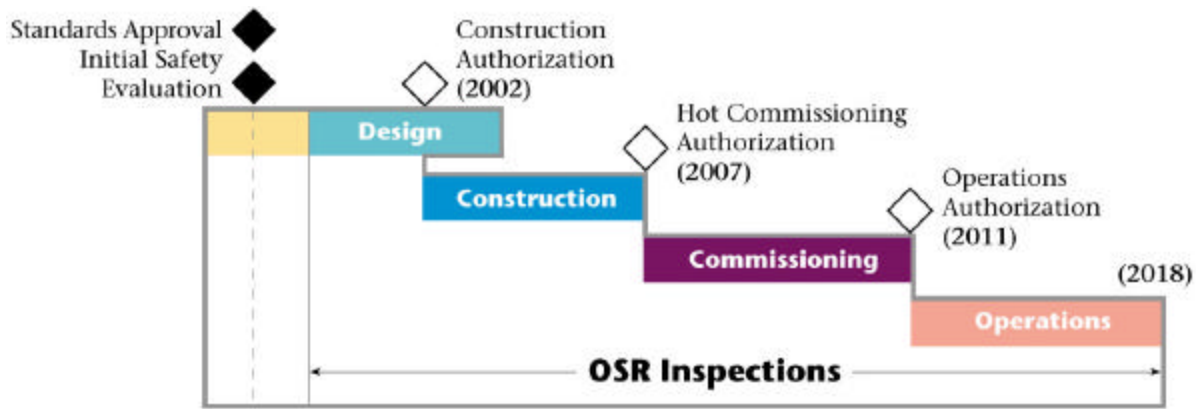


Figure 2. Current Schedule for RPP-WTP Activities

The near-term specific safety deliverable and authorization schedule is shown as Figure 3. This schedule “segments” the construction authorization submittals, which allows the Contractor to begin construction on facilities where the design and safety analysis are complete, rather than waiting until both design and safety analysis are complete for the entire RPP-WTP. ORP and the Contractor expect this approach will allow an earlier completion of the RPP-WTP.

⁶ <http://www.hanford.gov/osr/osr.asp>

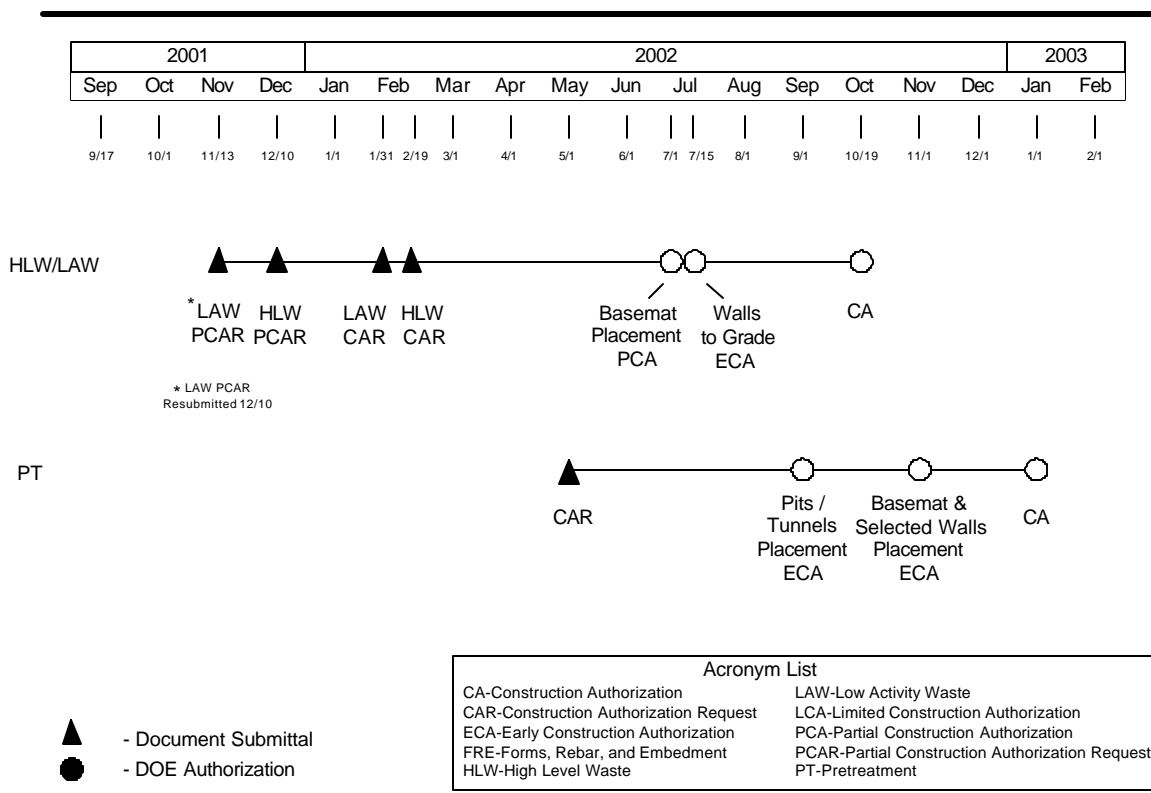


Figure 3. Near-Term Safety Deliverable and Authorization Schedule⁷

5.0 LISTENING TO INTERESTED PARTIES

The public is encouraged to make their views known to the OSR staff. There is no need to wait for an official comment period. A number of ways of communicating with the OSR are available:

- **Written comments** may be submitted to:

U.S. DOE Office of River Protection
Office of Safety Regulation
Attention: COMMENTS
P.O. Box 450, H6-60
Richland, WA 99352
- **Written comments** may be sent via facsimile to 509-376-3661.
- **Written comments** may be sent via the OSR's Internet website (<http://www.hanford.gov/osr/osr.asp>) feedback mail link.
- **E-mail** can be sent to the OSR at osr_feedback@rl.gov

⁷ Please note that the authorization dates shown are tentative, and are based on timely Contractor submittal of adequate supporting information for ORP to reach an authorization decision.

- **Voice mail** messages may be left by calling 1-800-253-2723 (or 376-4092 locally). The toll-free number also provides information about forthcoming meetings of potential interest.

The OSR wants interested parties to provide comments regarding safety and/or Contractor safety performance at any time. The OSR provides timely responses to all comments. The actions that the OSR may take when the Contractor fails to meet regulatory commitments are detailed in RL/REG-98-06, *Corrective Action Program Description*, available on the OSR website.

5.1 Listening to the Tribal Nations

The Hanford Site is located primarily on land ceded to the United States under separate treaties with different Tribal Nations. The Yakama Indian Nation, the Confederated Tribes of the Umatilla Indian Reservation, and the Nez Perce Tribe, therefore, have treaty rights at Hanford. Tribal governments have a unique legal relationship with the United States government as set forth in the Constitution of the United States, treaties, statutes, and court decisions. The United States and the state of Washington have committed to a government-to-government relationship with Native American Tribes. Rather than seeking tribal participation through public forums, ORP and OSR consult directly with the tribal governments before taking any action that may affect their rights and interests, as outlined in the DOE American Indian Policy.

The Wanapum People also are affected by Hanford decisions and, although not a federally recognized tribe, are included within this document and within the ORP Communications Plan and Openness Policy and Plan.

The OSR provides topical presentations when requested by the Tribal Nations and welcomes comments, questions, and input from the Tribal Nations. Important Tribal Nation contacts are indicated in the following table.

All contacts and requests made to or from any of the Tribal Nations are coordinated through the Office of Intergovernmental, Public and Institutional Affairs (IPI), Indian Nations Program, Kevin Clarke (509-376-6332).

Table 1. Tribal Nation Contacts and Addresses

Tribal Nation	Address	Contact(s)	Phone
Confederated Tribes of the Umatilla Indian Reservation	PO Box 638 Pendleton, OR 97801	Mr. Richard Gay Acting Environmental, Science, and Technology Program Manager	541-276-3165
Nez Perce Tribe	PO Box 365 Lapwai, ID 83540	Mr. Patrick Sobotta Director of ER and WM Program	208-843-7375
Confederated Tribes and Bands of the Yakama Nation	2808 Main Street Union Gap, WA 98903	Mr. Russell Jim, Manager ER and WM Program	509-542-2502
The Wanapum	Grant County P.U.D. PO Box 878 Ephrata, WA 98823	Ms. Lenora Seelatsee	509-754-0500 Ext. 3172

5.2 Listening to the HAB

The OSR also involves the interested public through interface with the HAB and its committees.

The OSR maintains a regulatory schedule (see Figure 3) that projects regulatory activities to allow the HAB and other interested parties to decide where they would like to be involved. The OSR requests opportunities to present information at HAB meetings before important regulatory decisions and actions occur. The OSR also responds to HAB requests for discussions of the program, its reports, and other data or information regarding regulatory activities. The OSR Openness Coordinator coordinates meetings with the ORP Public Involvement Team Lead who coordinates efforts with the IPI Public Involvement Manager. The ORP Public Involvement Team Lead along with the OSR Openness Coordinator ensures that appropriate staff attend the meetings of the HAB and its committees. The OSR is available at HAB meetings where regulation of the RPP-WTP facilities are discussed to answer ad hoc questions and to meet informally with interested public.

The ORP Public Involvement Team Lead, Mr. Peter Bengtson (509-373-9931) coordinates HAB activities with Ms. Yvonne Sherman, IPI Public Involvement Manager (509-376-6216).

5.3 Listening to Site Employees

The OSR encourages employees to make their views known on the regulation of the RPP-WTP to the OSR, their managers, the OSR Openness Coordinator, the responsible Contractor, or their DOE contact. Employees may take advantage of any or all of the methods of communication established for interested parties.

Through the ORP Office of Communications, the OSR may use site and local media as a resource to inform site employees of progress in regulation and to encourage employee feedback. Resources available include the *Hanford Reach* (site newspaper), all-employee announcements, newspaper ads, calendar of events in area papers, and the local public access television channel. The OSR welcomes invitations to appear at employee gatherings -- at clubs, lunchtime gatherings, or any location convenient to employees.

6.0 PROVIDING ACCESS FOR THE MEDIA

The OSR recognizes that the press and television media are significant avenues for informing the public of regulatory progress and opportunities to participate in the regulatory process. When requested, the OSR meets with individual members of the media to determine what is of interest to the media and in what format and in what detail the news could best be used. The OSR provides timely responses to requests for information.

The OSR Openness Coordinator serves as the "clearing house" for media requests and is responsible for coordinating contacts with the ORP Media Relations Manager. Any media requests for regulatory information should be directed to the OSR Openness Coordinator to ensure a timely response. The OSR Openness Coordinator and the ORP Media Relations Manager involve other members of the RPP when needed. The OSR will not be an advocate for

the success of the project since independence of the regulatory effort is essential and since the intent is to provide the press with objective and factual information.

7.0 INTERFACES WITHIN HANFORD

The Washington State Department of Ecology maintains a toll-free information line at 1-800-321-2008. Interested parties may use this number to be added to the Hanford cleanup mailing list or to request copies of the *Hanford Update*, a bimonthly newsletter. The *Hanford Update* provides general information about cleanup and compliance activities; information on public meetings, workshops, and other opportunities to participate in decisions affecting Hanford; and programmatic information on both ORP and Richland Operations Office (RL) matters.

The ORP Director, Office of Communications, is the primary resource for openness. The OSR informs the Director of prescheduled communication with the public.

Specific Office of Communications support comprises:

- **Director** - policy matters concerning external communications
Contact: Erik Olds, Acting Director (509-372-8656)
- **Media Relations** - general support, review of documents intended for public release, and preparation of press releases
Contact: Erik Olds (509-372-8656)
- **ORP Openness Coordinator** – coordination of all comments regarding RPP openness policy and plans
Contact: Sharon Braswell (509-376-8503)
- **Public Involvement** - primary interface for the HAB, assistance in preparing public presentations and scheduling meetings
Contact: Peter Bengtson (509-373-9931)
- **Indian Nations Program** - interface with the Tribal Nations
Contact: Kevin Clark (509-376-6332)
- **Freedom of Information and Public Reading Room** - information release, Internet integration and Internet resource issues, and reading room issues
Contacts: Yvonne Sherman (509-376-6216)
Cindy Moody-Brock (509-376-8368) [Site Web Master]

ORP is responsible for the technical and programmatic aspects of the RPP-WTP Contract and maintains many of the same openness interfaces as the OSR. The OSR coordinates communications with ORP. The ORP point-of-contact is Erik Olds (509-372-8656).

The Contractor has a Public Affairs representative. The OSR informs this representative of communications with interested parties and coordinates communications when needed.

8.0 INFORMATION SOURCES FOR INTERESTED PARTIES

Because the input of interested parties is extremely important to the OSR, a number of channels have been established to provide information so that interested parties understand how the regulation of Contractor work proceeds. This section discusses those sources of information.

8.1 Mailing List

The OSR maintains a mailing and notification list of those who have expressed an interest in being informed about RPP-WTP regulatory activities. Individuals who would like to be placed on the mailing list can notify the OSR through any of the ways noted in Section 5. The OSR Openness Coordinator is responsible for establishing and maintaining the mailing list.

The OSR prepares a triannual report of regulatory activities. This report is provided to interested individuals and organizations on the mailing list. General Services Support Contractor staff prepare the report for the OSR Openness Coordinator.

8.2 Documents

Documents are a "window" into regulatory activities. Therefore, the OSR makes these documents available to interested parties. The major regulatory policies and directions, actions resulting in documented evaluations, and the current schedule for the OSR inspection program are all available to interested parties in the DOE Public Reading Room and on the OSR website.

Additionally, the OSR makes as much other relevant information as possible available to interested parties. This includes all other OSR products (letters, memos, or meeting summaries), with the following two formal exceptions:

- Documents or portions of documents that contain limited rights data as defined in the Contract are not made available to the public. The OSR minimizes the amount of information that is categorized in this way. Some documents, from which limited rights data are deleted, are released to avoid the whole document from being made unavailable. The OSR Openness Coordinator reviews and concurs with any limited rights data determination.
- Records pertaining to individuals who are protected from public disclosure by the Privacy Act of 1974 and business records protected under the provisions of Federal Procurement Regulations are not made available to the public.

To avoid overwhelming interested parties with paperwork, administrative records of the OSR that do not influence a regulatory action are not routinely released because of their limited value. Administrative records include delegations of authority, requisitions, travel records, pay and leave information, and reports from internal tracking and control systems.

As part of making the regulatory process visible to the public, the OSR makes all changes to the Contractor's authorization basis⁸ available on the OSR website. Comments received by the OSR on authorization basis changes or other regulatory activities are made part of the public record and are scheduled for review and action, as appropriate. The OSR does not edit comments.

The OSR does not generate nor accept classified information as defined by DOE Memorandum, "Widespread or Public Release of Information," August 6, 1997. Any questions regarding the definitions or handling of classified information are addressed by the RL Office of Security and Emergency Services.

8.3 Public Meetings

Public meetings are announced in advance in the *Hanford Reach*, on the OSR's 1-800 information line, in the triannual report, in the *Hanford Update*, and/or on the OSR website. The OSR consults separately with each Tribal Nation regarding their need to meet on topics of interest.

When the OSR holds formal meetings with the Contractor on technical topics of regulatory interest, these meetings are open to interested parties, except where limited rights data are discussed. Interested parties are encouraged to attend and observe the regulatory process and interactions between the Contractor and the OSR. Meetings are open to assure the public that no special consideration is being given to the Contractor. However, since these are working meetings between the OSR and the Contractor, interested parties are asked to reserve their comments and to submit them after the meeting through other available channels. Meeting summaries are available on the OSR website and in the DOE Public Reading Room.

Because public meetings are such an important part of openness, responsibilities are briefly summarized below. The responsibilities and processes are more completely described in the OSR Management Directives, which are available on the OSR website.

The Safety Regulation Official is responsible for deciding on the types of public meetings that should be held and when they should be held.

The OSR Openness Coordinator is responsible for the following:

- Ensuring that meetings are open to the public with due consideration of limited rights data.
- Coordinating the scheduling of public meetings with the ORP Public Involvement Team Lead to ensure there are no conflicts with other DOE meetings.
- Ensuring that meeting notices are provided through the OSR 1-800 number, the website, and other mechanisms as appropriate.

⁸ The authorization basis is the composite of information provided by a contractor in response to radiological, nuclear, and process safety requirements, which forms the basis upon which DOE grants permission to perform regulated activities.

- Ensuring that public meetings are conducted efficiently according to the agenda.
- Ensuring that public meetings are recorded and a meeting summary is prepared.
- Ensuring that documentation of public meetings is made available to the public through the DOE Public Reading Room and the OSR website, generally within 20 working days of the meeting.
- Ensuring that OSR staff are provided with information from public meetings so that it is available at all levels of regulatory activities.
- Three times a year (January, May, and September) the OSR Openness Coordinator will endeavor to schedule a presentation for one of the Regional Citizen, Environmental and Public Interest Organizations. The presentation will be open to the public and will be given by various members of the OSR staff, as assigned by the Safety Regulation Official. Topics of the presentation will be related to recent activities of the project and upcoming activities, focusing on OSR safety activities.
- For meetings associated with a major regulatory action, ensuring that:
 - Interested members of the public who indicate a desire to speak at the meeting are able to register on a sign-up sheet.
 - Interested parties who indicate a desire to place themselves on the OSR mailing list are able to do so.
 - Time limitations for interested parties to make comments (e.g., time limits for individual speakers and on the overall public comment period) are known.
 - Meeting summaries include sufficient information to identify comments related to specific OSR actions or OSR activities in general. Such comments are provided to responsible OSR staff for consideration in relation to regulatory business.

OSR staff are responsible for providing information to the OSR Openness Coordinator on meetings that should be open to the public.

8.4 Press Releases

On a case-by-case basis, press releases are issued to local, regional, and national media to inform the public of (1) significant events, (2) regulatory decisions, (3) technical reports, and 4) other pertinent information and data regarding the RPP. The content and context of the release, approval of the distribution, and issuance of each press release are coordinated with ORP Media Relations Manager.

8.5 The OSR Website

The primary goal of the OSR website is to provide useful, readily accessible, and timely information to interested parties who have access to the Internet. A secondary goal is to allow rapid two-way communication through an e-mail link and feedback form. The OSR would like to know from website users how useful the site information is and how the site might be improved and encourages them to use the feedback form.

The OSR's website (<http://www.hanford.gov/osr/osr.asp>) provides several types of information including:

- General information about the OSR
- Organizational information
- Calendar of events and current information on regulatory activities
- Information on the OSR Inspection Program, including inspection administrative and technical procedures, inspection schedules, and inspection results⁹
- Public documents, including meeting summaries
- Documents available for public comment and related public comments that have been received
- A list of all publicly available documents
- Electronic mail access to the OSR for comments
- Links to other related Internet websites.

Most of the documents are available in Adobe PDF format for rapid search and easy downloading and printing.

The website is the joint responsibility of the OSR Openness Coordinator and the OSR Content Manager.

- The Openness Coordinator is responsible for ensuring information on the website is current and complete. The coordinator decides on the content of the OSR website and provides the information to the Content Manager.
- The Content Manager is the single point-of-contact for the OSR website and is responsible for the timely placement of information on the website. The Content Manager is responsible

⁹ OSR performs extensive inspection of existing Contractor management systems and current construction activities to ensure the Contractor is adequately meeting its radiological, nuclear, process, industrial hygiene, and industrial safety commitments.

for updates, revisions, maintenance, and major modifications to the web pages. The Content Manager periodically examines website usage by page and recommends which pages need improvement and which could be eliminated. The OSR intends to continually improve the website to make it easier to use.

The OSR preserves the privacy of those who visit the website and does not collect information on visitors other than a simple count of the pages that are visited.

The OSR website meets overall DOE site requirements, which are established by IPI, and is overseen and supported by the Site Web Master.

8.6 Reading Room

Regulatory documents are made available to interested parties at the DOE Public Reading Room. They are cataloged and indexed by the library staff and copies are available for duplication with a modest per-page cost. The Public Reading Room, open weekdays from 10:00 a.m. to 5:00 p.m., is located at the Washington State University Tri-Cities Campus, Consolidated Information Center, Room 101L, 2710 University Drive, Richland, Washington.

Responsibilities for ensuring that the documents are provided to the Public Reading Room are defined in OSR Management Directive 2.1, *Information Management*. An index of the regulatory information available at the Public Reading Room is maintained on the OSR website.

8.7 Actions

As noted earlier, comments are an integral part of the OSR Openness Policy and Plan. Input on OSR actions and decisions may be received via postal mail, electronic mail, OSR website, OSR 1-800 number, facsimile, telephone, or meetings.

All comments received are logged and tracked in a comment database. Comments are answered individually except where the OSR Openness Coordinator determines, with concurrence of the Safety Regulation Official, that a summary response to numerous similar comments is more appropriate. This would primarily occur during public comment on formal OSR regulatory actions and documents. Comments in the log are not edited or summarized in any way.

The OSR responds promptly to all comments. The process and responsibilities to make this possible are detailed in the OSR Management Directives and summarized below.

- The Openness Coordinator ensures that comments from the public are retrieved from all sources and logged into the database. Logging includes coordinating with the Information Management Coordinator to ensure that an appropriate document number is assigned to each comment to facilitate tracking.
- The Openness Coordinator determines which responsible member of the OSR could best make use of the comment and provides it directly to that person.

- The Openness Coordinator determines if a direct response to the individual who offered the comment is required. If a response is required, the Openness Coordinator assigns a member of the OSR staff to prepare the response. The assigned OSR staff member is identified in the database.
- A due date, generally less than 10 days from the receipt of the comment, is established for response preparation.

A clear and concise response is provided -- responding to a question when asked and agreeing or disagreeing with a comment. In disagreeing with a comment, the reason why is given in clear every-day language. "Comment noted" is not an acceptable response and is not given.

- The Openness Coordinator ensures that the response is prepared, delivered, and recorded.

Comments on formal regulatory actions and documents are consolidated into summaries describing how they were addressed in the regulatory action (if applicable). This information is provided as a formal part of final documents. Summaries briefly describe those significant comments that resulted in substantial change from a draft document to a final document.

8.8 Information Phone Line

The OSR toll-free telephone information line is 1-800-253-2723. It provides general information about scheduled OSR activities. The OSR welcomes comments submitted via this 1-800 number. The OSR Openness Coordinator is responsible for keeping the information on the 1-800 line current and the communication channel responsive. Thus, the Openness Coordinator:

- Decides what information should be used on the 1-800 number, paying particular attention to announcing meetings.
- Prepares the scripts and makes appropriate changes to the message.
- Monitors the 1-800 number for incoming comments or messages, responds to the caller (if requested), and consults with OSR staff when necessary.
- Maintains a log of all comments or requests received on the 1-800 number as well as how each was addressed.

To some, the 1-800 number recorded messages might appear impersonal. Therefore, those who wish are encouraged to make use of the direct telephone channels to speak to someone in the OSR or to arrange a face-to-face meeting.

9.0 REFERENCES

DOE/RL-96-25, *Policy for Radiological, Nuclear, and Process Safety Regulation of RPP-WTP Contractor*, U.S. Department of Energy, Office of River Protection, 2001.

DOE/RL-96-26, *Memorandum of Agreement for the Execution of Radiological, Nuclear, and Process Safety Regulation of the RPP-WTP Contractor*, U.S. Department of Energy, Office of River Protection, 2001.

RL/REG-97-05, *Office of Safety Regulation Management Directives*, U.S. Department of Energy, Office of River Protection, 2001.

MD 2.1, "Information Management"

RL/REG-98-06, *Corrective Action Program Description*, U.S. Department of Energy, Office of River Protection, 2001.

10.0 LIST OF TERMS

DOE	U.S. Department of Energy
HAB	Hanford Advisory Board
IPI	Office of Intergovernmental, Public, and Institutional Affairs
ORP	Office of River Protection
OSR	Office of Safety Regulation
RPP-WTP	River Protection Project Waste Treatment Plant
RL	Richland Operations Office

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